

JUDGE'S COPY 54
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~~ORIGINAL~~
United States District Court
Middle Dist of Penna.

WM. Branch
Plaintiff

Civil action No. 1 CV-001728

Russian et., al.
Defendant

Judge Rambo

FILED

NOV 30 2001

SUPPORT Memorandum
for Injunction Relief

PER 9/8
HARRISBURG, PA. DEPUTY C

if it please the court here comes WM. Branch asking the court to grant injunctive Relief from prison stuff.

- 1) Filing false charge's against me in Retaliation for Reporting misconducts by staff grievance # 14901 also the supt has not answered my final appeal to him on this grievance C/O Kowarski called me a ass hole. No answer on WAM-3095-01
- 2.) conspiracy with other staff members to put me in the RHA and to file false charge's against all entries on my Quarters Card for failure to sit for count come from 2 Shift each time C/O Kowarski was there telling the staff member to make the entry of the four entry over a year's time 2 times I was asleep ~~time~~ 1 time I was on a top Bunk and could not hang my feet down, and I had Bottom Bunk status and should not have been up there in the first place, which C/O Kowarski put me there because I asked to be moved to another bed

because C/O Kowarski had Put me in this Bed next to a inmate that always talked about having sex with men who was later wrote up and Put in the R.H. for showing himself (Penis) to a female C/O on 3 sh infact this C/O allowed this inmate to intimidate other inmates with statements like "I'll Fuck you in your ASS".

While I was housed next to this inmate I could not Pray, he was always looking at Bet to saying C O Bo I need some womb- Hot womb and when I told C/O Kowarski I need to move, he wrote on my Request that I was not to be moved. I wrote the Unit manager and told her that if anything happen to me, I would hold her Responsible. She told him to move me other beds were open but I was put on the top Bunk.

Hearing Examiner

on the misconduct I Received 30 Day Cell Restriction the H. E. Dismissed the disobeying a order but keep the failer to sit for count.

I had three witness inmates in Beds #6, 7 & 8 all face me and the C/O muir who counted first and who called Count, he counted me, passed C/O Kowarski who said Branch sit for count, and the Hearing Examiner upheld C/O Kowarski. if you dismiss disobeying and order you have to dismiss failer to sit for count, because I have to be disobeying an order by not sitting for count, but I was sitting for count.

I ask that the court grant me injunctive Relief as I am accessing the courts and intitle to the Courts Protection

I amend U.S.C.A.

Date 11-26-01

Respectfully

William Branch

PROOF OF SERVICE

I, the undersigned, verify that I have served a copy of this petition by U.S. postage paid mail to:

<i>Judge Rambo</i>	<i>State attorney General</i>	<i>US Justice Dept</i>
<i>Po Box 983</i>	<i>Strawberry Sq</i>	<i>Washington DC 2053</i>
<i>Harrisburg Pa 17108</i>	<i>Harrisburg Pa-17120</i>	

MOTION TO PROCEED IN FORMA PAUPERIS

I, the undersigned, move this Honorable Court for an order permitting me to proceed In Forma Pauperis. I had previously been granted In Forma Pauperis status. My financial situation has not changed. I am still unable to pay the cost of the said proceedings.

VERIFICATION

I, the undersigned, verify that the above statements are true and correct and that any false statements herein are made subject to Title 18 Pa.C.S.A. section 4904 relating to unsworn falsification to authorities.

Respectfully submitted,

Dated: 11-26-01

William Branch CF3756

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